

**BACKUS | BURDEN**  
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 Attorneys for Defendants

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LARON ONEAL, individually,	)	Case No.	2:23-cv-00643-APG-MDC
	)		
Plaintiff,	)		
vs.	)		
	)		<b>MOTION TO REMOVE</b>
	)		<b>DALLIN KNECHT, ESQ.</b>
ALBERTSON'S, LLC d/b/a	)		<b>AS COUNSEL OF RECORD FOR</b>
ALBERTSON'S; SAFEWAY INC. d/b/a	)		<b>DEFENDANTS ALBERTSON'S, LLC d/b/a</b>
ALBERTSON'S; ALBERTSON'S	)		<b>ALBERTSON'S; SAFEWAY INC. d/b/a</b>
STORES SUB LLC; AB ACQUISITION	)		<b>ALBERTSON'S; ALBERTSON'S STORES</b>
LLC; DOES 1 through 100 and ROE	)		<b>SUB LLC; AB ACQUISITION LLC</b>
CORPORATIONS 1 through 100,	)		
inclusive,	)		
Defendants.	)		

**. TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that Defendants ALBERTSON'S, LLC d/b/a ALBERTSON'S;  
 SAFEWAY INC. d/b/a ALBERTSON'S; ALBERTSON'S STORES SUB LLC; AB  
 ACQUISITION LLC, by and through its counsel of record, JACK P. BURDEN, ESQ. and  
 JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN hereby provide notice that DALLIN  
 KNECHT, ESQ. is no longer affiliated with the law firm of BACKUS | BURDEN and thus will no  
 longer be associated as counsel of record for that Defendants ALBERTSON'S, LLC d/b/a  
 ALBERTSON'S; SAFEWAY INC. d/b/a ALBERTSON'S; ALBERTSON'S STORES SUB LLC;  
 AB ACQUISITION LLC in this matter.

As such, Defendants ALBERTSON'S, LLC d/b/a ALBERTSON'S; SAFEWAY INC. d/b/a ALBERTSON'S; ALBERTSON'S STORES SUB LLC; AB ACQUISITION LLC respectfully moves this Honorable Court for an Order removing DALLIN KNECHT, ESQ. as counsel of record in this matter with all parties to update their respective service lists, accordingly.

JACK P. BURDEN, ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN will continue to serve as counsel of record for Defendants ALBERTSON'S, LLC d/b/a ALBERTSON'S; SAFEWAY INC. d/b/a ALBERTSON'S; ALBERTSON'S STORES SUB LLC; AB ACQUISITION LLC in this action.

All items including, but not limited to, pleadings, papers, correspondence, documents, and future notices in this action shall continue to be directed to, and served on JACK P. BURDEN, ESQ. and JACQUELYN FRANCO, ESQ. of BACKUS | BURDEN as counsel of record for the Defendants ALBERTSON'S, LLC d/b/a ALBERTSON'S; SAFEWAY INC. d/b/a ALBERTSON'S; ALBERTSON'S STORES SUB LLC; AB ACQUISITION LLC.

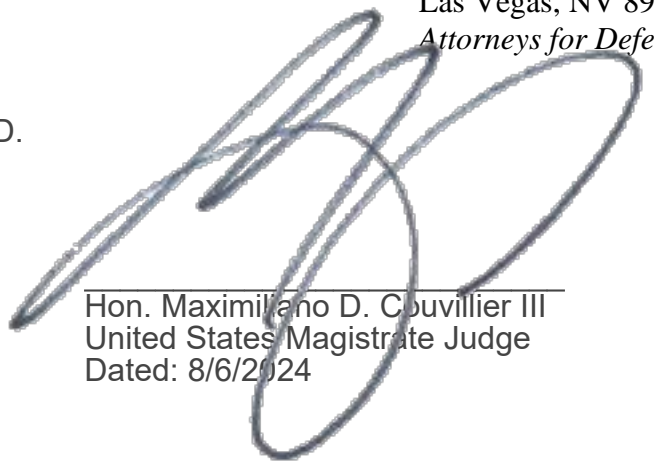
DATED: July 17, 2024

**BACKUS | BURDEN**

By: /s/ Jacquelyn Franco

Jack P. Burden, Esq.  
Jacquelyn Franco, Esq.  
3050 South Durango Drive  
Las Vegas, NV 89117  
*Attorneys for Defendants*

IT IS SO ORDERED.

  
\_\_\_\_\_  
Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
Dated: 8/6/2024

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**CERTIFICATE OF SERVICE**

I am a resident of and employed in Clark County, Nevada. I am over the age of 18 years and not a party to the within action. My business address is: 3050 South Durango Drive, Las Vegas, Nevada, 89117.

On July 17, 2024 I served this document on the parties listed on the attached service list via one or more of the methods of service described below as indicated next to the name of the served individual or entity by a checked box:

**VIA U.S. MAIL:** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

**VIA FACSIMILE:** by transmitting to a facsimile machine maintained by the attorney or the party who has filed a written consent for such manner of service.

**BY PERSONAL SERVICE:** by personally hand-delivering or causing to be hand delivered by such designated individual whose particular duties include delivery of such on behalf of the firm, addressed to the individual(s) listed, signed by such individual or his/her representative accepting on his/her behalf. A receipt of copy signed and dated by such an individual confirming delivery of the document will be maintained with the document and is attached.

**BY E-MAIL:** by transmitting a copy of the document in the format to be used for attachments to the electronic-mail address designated by the attorney or the party who has filed a written consent for such manner of service.

**BY ELECTRONIC MEANS:** by electronically filing and serving with the court's vendor.

I declare that under penalty of perjury under the laws of the State of Nevada that the above is true and correct. I further declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

/s/ Anne Raymundo

An employee of **BACKUS | BURDEN**

**BACKUS | BURDEN**

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**SERVICE LIST**

ATTORNEYS OF RECORD	PARTIES REPRESENTED	METHOD OF SERVICE
Farhan R. Naqvi, Esq. Sarah M. Banda, Esq. Jacob A. Suty, Esq. NAQVI INJURY LAW 9500 West Flamingo Road, Suite 104 Las Vegas, Nevada 89147 T: (702) 553-1000 = F: (702) 553-1002 <a href="mailto:naqvi@naqvilaw.com">naqvi@naqvilaw.com</a> <a href="mailto:sarah@naqvilaw.com">sarah@naqvilaw.com</a> <a href="mailto:jsuty@naqvilaw.com">jsuty@naqvilaw.com</a>	Plaintiff	<input type="checkbox"/> Personal service <input type="checkbox"/> Email service <input type="checkbox"/> Fax service <input type="checkbox"/> Mail service <input checked="" type="checkbox"/> CM/ECF Electronic Means
STEVEN T. JAFFE, ESQ. Nevada Bar No. 7035 <a href="mailto:sjaffe@halljaffe.com">sjaffe@halljaffe.com</a> HALL JAFFE, LLP 7425 Peak Drive Las Vegas, Nevada 89128 (702) 316-4111 Fax (702) 316-4114	Plaintiff co-counsel	<input type="checkbox"/> Personal service <input type="checkbox"/> Email service <input type="checkbox"/> Fax service <input type="checkbox"/> Mail service <input checked="" type="checkbox"/> CM/ECF Electronic Means

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